

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Alex Poitevint, Treasurer Republican National Committee - RNC 310 First Street, SE Washington, DC 20003

Identification Number:

C00003418

JAN 2 7 2000

Reference:

February Monthly (1/1/99-1/31/99), March Monthly (2/1/99-2/28/99), April Monthly (3/1/99-3/31/99), May Monthly (4/1/99-4/30/99), June Monthly (5/1/99-5/31/99), July Monthly (6/1/99-6/30/99), August Monthly (7/1/99-7/31/99), September Monthly (8/1/99-8/31/99) and

October Monthly (9/1/99-9/30/99) Reports

Dear Mr. Poitevint:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page. Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "federal share of the goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt of corporate in-kind contributions on the committee's I Schedules as follows:

The full amount of the in-kind contributions received by the non-federal account should be disclosed on Schedule I with a supporting memo-Schedule A that itemizes each contributor's identification. 11 CFR 104.8(e) In addition, in order to reflect the fact that the reported in-kind contributions have been expended in the same period as received by the committee, the

total amount of the in-kind contributions should be entered on Line 5 of the Schedule I as an other disbursement with a notation reference to the memo Schedule A filed for Line 1. Alternatively, the committee may include the total amount of the in-kind contributions to the non-federal account on Line 1 and then make a cross reference to the entries on Schedule H4 to which the total amount relates. This reference should specify particular pages of the Schedule H4 where the in-kind donors are identified.

Please amend your I Schedules to disclose non-federal in-kind contributions in accordance with Advisory Opinion 1992-33.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 594-1130.

Sincerely,

Scott Francis

Reports Analyst

Reports Analysis Division

State Francis

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